

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:20-cv-00947-TMC

MOTION TO AMEND COMPLAINT

Plaintiffs, Jane Does 1-9, by and through their undersigned counsel, respectfully moves this Court for leave to amend their Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. Specifically, Plaintiff requests leave to amend the pleadings to add two additional causes of action.

A copy of the proposed Third Amended Complaint is attached hereto as Exhibit 1. In support of this Motion, Plaintiffs rely on their Memorandum in Support, the statements herein, the pleadings filed in this case, the rules of Court and such other matters as may be properly presented to the Court.

In accordance with Local Civil Rule 7.02, Counsel for the Plaintiff has conferred or attempted to confer with Counsel for the Defendants in good faith to resolve the matter contained in the motion.

WHEREFORE, the Plaintiffs respectfully request this Court enter an Order granting them leave to file their amended Complaint.

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Respectfully submitted,

BELL LEGAL GROUP, LLC

s/J. Edward Bell, III

J. Edward Bell, III (1280)

Joshua M. W. Salley (13214)

BELL LEGAL GROUP, LLC

219 North Ridge Street

Georgetown, SC 29440

TEL.: (843) 546-2408

FAX: (843) 546-9604

ebell@edbelllaw.com

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

Tyler S. Thompson (admitted *Pro Hac Vice*)

Liz J. Shepherd (admitted *Pro Hac Vice*)

Jordan A. Stanton (admitted *Pro Hac Vice*)

DOLT, THOMPSON, SHEPHERD & CONWAY, PSC

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

ATTORNEYS FOR PLAINTIFFS

Georgetown, SC
October 4, 2020